

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

DANE HARREL, *et al.*,  
Plaintiffs,

vs.

KWAME RAOUL, *et al.*,  
Defendants.

Case No. 3:23-cv-141-SPM

FEDERAL FIREARMS  
LICENSEES OF ILLINOIS, *et al.*,  
Plaintiffs,

vs.

JAY ROBERT “J.B.” PRITZKER, *et al.*,  
Defendants.

Case No. 3:23-cv-215-SPM

CALEB BARNETT, *et al.*,  
Plaintiffs,

vs.

KWAME RAOUL, *et al.*,  
Defendants.

Case No. 3:23-cv-209-SPM

JEREMY W. LANGLEY, *et al.*,  
Plaintiffs,

vs.

BRENDAN KELLY, *et al.*,  
Defendants.

Case No. 3:23-cv-192-SPM

**AGREED MOTION FOR ENTRY OF PROPOSED STIPULATION REGARDING  
COORDINATED PRELIMINARY INJUNCTION BRIEFING**

Counsel from the Office of the Attorney General of Illinois bring this agreed motion on behalf of the officials of the State of Illinois named as Defendants in one or more of the above-captioned cases, specifically: Brendan Kelly, in his official capacity as Director of the Illinois State Police; Kwame Raoul, in his official capacity as Attorney General of Illinois; and JB Pritzker, in his official capacity as Governor of Illinois (collectively, the “State Defendants”). With the agreement of all Plaintiffs named in the above-captioned cases, the State Defendants move for entry of the agreed stipulation submitted simultaneously to the Court’s proposed order inbox and, in support of this request, state as follows:

1. All Plaintiffs in the above-captioned, separate actions have pending before this Court their respective complaints wherein they raise various challenges to the implementation and/or enforcement of Illinois’ Public Act 102-1116, a/k/a Protect Illinois Communities Act, 720 ILCS 24-1.9, et seq.

2. Plaintiffs and the State Defendants—ISP Director Kelly, Attorney General Raoul, and Governor Pritzker—have reached an agreement, subject to the Court’s approval, to streamline the proceedings in these cases by entering an agreed stipulation regarding the briefing of Plaintiffs’ respective preliminary injunction motions.

3. Among other things, the agreed stipulation provides one deadline for one consolidated response by the State Defendants to Plaintiffs’ motions for preliminary injunction (March 2, 2023), and another deadline for the State Defendants to answer or otherwise plead to all of Plaintiffs’ respective complaints (March 16, 2023).

4. Entry of the agreed scheduling order is in the interest of judicial economy as it provides for one consolidated response to Plaintiffs’ motions for preliminary injunction, rather than four separate responses filed on varying dates repeating many of the same arguments. The

scheduling order also addresses page limits for response briefs, deadlines for filing reply briefs, and page limits for reply briefs.

5. This motion is being filed simultaneously in all above-captioned cases.

6. Pursuant to Section 2.10 of the CM/ECF User Manual, the proposed order is being submitted to the Court's proposed documents email address, with all counsel of record in all above-captioned cases copied.

WHEREFORE, the State Defendants request that the Court adopt and enter the agreed stipulation.

Dated: February 17, 2023

Respectfully submitted,

/s/ Laura K. Bautista  
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### **CERTIFICATE OF SERVICE**

I certify that on February 17, 2023, I caused a copy of the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification to all counsel of record.

/s/ Laura K. Bautista  
Laura K. Bautista  
Assistant Chief Deputy Attorney General